

The purpose of this regulation is to acquaint you with responsibilities of contractors engaging privately in activities that raise questions of possible conflicts of interest or the appearance of an impropriety. By being aware of the standards required, contractors should be able to recognize and avoid situations that might involve improper conduct and be alert to seek assistance in resolving any questions that may arise. This notice is not intended to cover all situations, but is intended to highlight in general terms problems that might easily arise from engaging in commercial or other private transactions or activities that could damage the interests of the United States.

Contractors should act at all times in a manner that ensures the following:

- (1) That Government decisions will not be influenced by an employee's private interests;
- (2) That public office will not be used for private gain; and
- (3) That public confidence in the integrity of Government operations will be maintained.

It is, moreover, just as important to avoid the appearance of a conflict or unethical conduct. In the case of contractors, any conflict may be resolved in favor of termination of the contractual relationship.

Given the fact that CIA contractors are provided access to information that is not available to private individuals generally, it is imperative that every effort be made to ensure that CIA contractors do not appear to gain any improper advantage in their private dealings because of their Agency employment. Accordingly, with respect to activities discussed herein, contractors must submit outside activity requests in accordance with [ ] Careful scrutiny must be given to requests that may be perceived as involving the interests of the United States, even where the matter may not involve the individual's Agency duties. All outside activity requests will be reviewed on a case-by-case basis.

Transactions that have or may have significant foreign policy, military, or national security implications generally will not be authorized. This includes, but is not limited to, trading in weapons, aircraft, and certain commodities or other articles of strategic importance, such as oil and wheat, which would be thought by the public to be of significant national interest. Requests to trade in such items must be given careful scrutiny and can be approved only by a Deputy Director or Head of Independent Office, in consultation with the Office of General Counsel. All transactions that involve these considerations must be reported if it also involves a foreign governmental unit.

These restrictions are not intended to prohibit normal, active participation in professional or other organizations.

which serve the interests of both the employee and the Government. However, such participation will be reviewed in accordance with this notice when it involves international relations or trade that reasonably can be expected to concern the Agency.